UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK	X
PATRICIA O'BRIEN,	; ; ;
Plaintiff,	: 1: 14-cv-00758-JTC ECF Case
v. CHARLES I. TURNER and ACCREDITED COLLECTION AGENCY, INC. a/k/a A.C.A. RECOVERY, INC.,	STIPULATION AND PROPOSED ORDER DISMISSING ACTION AND RETAINING JURISDICTION TO ENFORCE SETTLEMENT
Defendants.	:
	: ·-x

WHEREAS, Defendant Charles I. Turner and Plaintiff Patricia O'Brien have reached a Settlement Agreement that requires Defendant to make payments to Plaintiff over a six-month period to begin on January 5, 2016, and provides for this Court to retain jurisdiction to enforce the Settlement Agreement in the event of a default in payment;

THEREFORE, the parties hereby agree and request an order from the Court as follows:

- 1. This action is dismissed in its entirety without prejudice.
- 2. The Court retains jurisdiction solely to enforce the Settlement Agreement. Either party may file a motion to enforce the Settlement Agreement any time before August 1, 2016.
- 3. Unless enforcement proceedings are pending, this case will be treated for all purposes as dismissed with prejudice after August 1, 2016, without further order of Court.

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original and all of which taken together shall be deemed one and the same instrument. Facsimile signatures shall operate as originals for purposes of this Stipulation.

WESTERN NEW YORK LAW CENTER CHARLES I. TURNER

s/ Matthew A. Parham

Matthew A. Parham

s/ Charles I. Turner

By: Charles I. Turner

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By: Charles I. Turner, Esq. turner.charles53@yahoo.com
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Defendant, pro se

SO ORDERED:

THE HONORABLE JOHN T. CURTIN SENIOR UNITED STATES DISTRICT JUDGE WESTERN DISTRICT OF NEW YORK